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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

LORI WAKEFIELD, individually and
on behalf of a class of others similarly
situated,

Plaintiff,

v.

VISALUS, INC.,
a Nevada corporation,

Defendant.

No. 3:15-cv-01857-SI

**Joint motion to extend the briefing
schedule on ViSalus' motion to
decertify**

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Attorneys for Plaintiff Wakefield and the Certified Class

LR 7.1 CERTIFICATION

The undersigned counsel certify that they have conferred and jointly agree to the relief requested herein.

JOINT MOTION

Plaintiff Lori Wakefield (“Plaintiff”) and Defendant ViSalus, Inc. (“Defendant”) jointly move the Court to extend the deadline for Plaintiff to respond to ViSalus’ Motion to Decertify the Class (Dkt. 306), from May 31, 2019 until June 3, 2019, and for a corresponding three-day extension for Defendant to file its reply, from June 14, 2019 until June 17, 2019. In support of their joint request, the parties state as follows:

1. During a telephone conference on April 22, 2019, the Court ordered Defendant to file its motion to decertify the class by May 17, 2019, Plaintiff to file her response by May 31, 2019, and Defendant to file its reply by June 14, 2019 (Dkt. 292).
2. On May 17, 2019, Defendant filed its Motion to Decertify the Class (Dkt. 306).
3. On May 30, 2019, Plaintiff requested that Defendant agree to a three-day extension on Plaintiff’s Response to Defendant’s Motion to Decertify the Class (to Monday, June 3, 2019). Plaintiff stated that she would agree to a reciprocal three-day extension on Defendant’s Reply (to Monday, June 17, 2019). Defendant agreed.
4. Good cause exists for the requested extension. Plaintiff has been working diligently to prepare her response, which requires the additional time to address the numerous issues raised in Defendant’s motion. This extension will not impact other existing deadlines. This extension is not sought for purposes of delay.

NOW THEREFORE, Plaintiff Lori Wakefield and Defendant ViSalus, Inc. respectfully and jointly request that the Court enter an Order (i) extending the May 31, 2019 deadline for Plaintiff to file her response to Defendant's motion to decertify until June 3, 2019, and (ii) extending the June 14, 2019 deadline for Defendant to file its reply until June 17, 2019.

Respectfully submitted,

Date: May 30, 2019

By: /s/ Jonas Jacobson

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Date: May 30, 2019

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